

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

No. 2:21-cv-00563-JCC

**DECLARATION OF ERIK PETERSON
IN SUPPORT OF VALVE
CORPORATION'S OPPOSITION TO
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

Erik Peterson states and declares as follows:

1. I am over 18 years of age, I have personal knowledge of the matters stated herein and I am competent to testify to these matters.

2. I have been employed at Valve Corporation ("Valve") since 2016. Like most Valve employees, I don't have a job title, but my work at the company has been as a part of the Steam business team. My primary role has been interfacing with Valve's business partners, which include video game publishers and developers. I also regularly work on issues related to Steam Keys, including the Steam Key Request Wizard and Steamworks Documentation regarding Steam Keys discussed below.

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VALVE CORPORATION'S OPPOSITION TO PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION – 1

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1 3. Valve provides game developers and publishers who sell their games on Valve's
2 Steam platform with Steam Keys—single-use alphanumeric codes that customers can use to
3 activate a game on Steam—to sell their games on other stores and at retail. Valve does not
4 charge developers or publishers for Steam Keys.

5 4. I am one of the authors of various versions of the Steam Keys Documentation,
6 which Valve makes publicly available on the Steamworks Documentation website at
7 <https://partner.steamgames.com/doc/features/keys>.¹

8 5. The version of the Steam Keys Documentation currently available on
9 <https://partner.steamgames.com/doc/features/keys> was released on February 24, 2023, but there
10 have been prior versions going back before 2017.

11 6. A true and correct copy of the Steam Keys Documentation that was released on
12 January 14, 2017 is attached to this Declaration as Exhibit 1.

13 7. A true and correct copy of the current Steam Keys Documentation that has been
14 in effect since February 24, 2023 is attached to this Declaration as Exhibit 2.

15 8. In April 2018, Valve released a new Steam Key Request Wizard for developers
16 and publishers to use to request Steam Keys. *See* [https://steamcommunity.com/groups/-](https://steamcommunity.com/groups/-steamworks/announcements/detail/1652133167126418778)
17 [steamworks/announcements/detail/1652133167126418778](https://steamcommunity.com/groups/-steamworks/announcements/detail/1652133167126418778). The Steam Key Request Wizard
18 takes developers and publishers through a series of online steps to help them request the right
19 type and quantity of Steam Keys. The Steam Key Request Wizard is still in use today.

20 9. Attached to this Declaration as Exhibit 3 is a document containing screenshots
21 that I prepared of the steps the Steam Key Request Wizard takes developers and publishers
22
23

24 ¹ Steamworks is a free suite of features, tools, and services available to any developer
25 or publisher to use in their applications on Steam. Valve makes publicly available an extensive
set of documentation about the Steamworks offerings through the Steamworks Documentation
home page at <https://partner.steamgames.com/doc/home>.

1 through when they request standard release Steam Keys.² These are the screenshots as they
2 appear today, but the process has been substantially the same since Valve released the Steam
3 Key Request Wizard in April 2018.³

4 10. Beginning with the April 2018 Steam Key Request Wizard release, publishers
5 and developers requesting Steam Keys have been presented with, at the top of each page in each
6 step of the multi-step process, a hyperlinked invitation to “View Steam Key Documentation.”
7 The link takes the reader to the Steam Keys Documentation page at
8 <https://partner.steamgames.com/doc/features/keys>, which is what appears in Exhibit 2.

9 11. The final page of the Steam Key Request Wizard tells a developer or publisher
10 requesting Steam Keys to “Please confirm your request” and then asks, “Before completing
11 your request, please review and agree that you understand the following:”—followed by three
12 checkboxes that correspond to portions of the Steam Key Rules and Guidelines.

13 12. A true and correct copy of the Steam Keys Documentation that was released on
14 April 5, 2018 is attached hereto as Exhibit 4. Beginning with that release, the first two bullets
15 in the Steam Key Rules and Guidelines portion of the Steam Keys Documentation have
16 corresponded with the first two checkboxes that appear at the last step of the Steam Key Request
17 Wizard process. Those first two bullets in the Steam Key Rules and Guidelines, as of April 5,
18 2018, were:

20 ² The Steam Keys Documentation explains that standard release Steam Keys are “the
21 most common type of key on Steam, which is usually tied to a Steam store or retail Steam Key
22 package. These keys are appropriate for retail boxes or sales on other digital stores.”
<https://partner.steamgames.com/doc/features/keys>.

23 ³ Steam Key requests are made for specific apps. The first image in Exhibit 3 is the
24 Steamworks app admin page for an app called Aperture Desk Job, which includes a link to
25 “Request Steam Product Keys” that opens the Steam Key Request Wizard. This particular
app is shown as an example and portions of this page will vary by app—but the “Request
Steam Product Keys” link will appear on the Steamworks app admin page for apps that are
eligible to request Steam Keys.

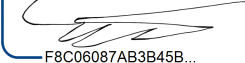
Steam Key Rules and Guidelines

- You should use keys to sell your game on other stores in a similar way to how you sell your game on Steam. It is important that you don't give Steam customers a worse deal.
- It's OK to run a discount on different stores at different times as long as you plan to give a comparable offer to Steam customers within a reasonable amount of time.

Compare Exhibit 3 (sixth page) with Exhibit 4 hereto.

I declare under penalty of perjury that the forgoing is true and correct.

DATED this 16th day of May, 2024 at Bellevue, Washington.

DocuSigned by:

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Erik Peterson